

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA**

**LIBBIE E. WILLIAMS**

**\* CIVIL ACTION**

**\***

**VERSUS**

**\* NUMBER: 2:24-cv-01727**

**\***

**LOUISIANA COMMUNITY AND  
TECHNICAL COLLEGE SYSTEM**

**\***

**\* DISTRICT JUDGE: JAMES D. CAIN, JR.**

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**\* MAGISTRATE: CAROL B. WHITEHURST**

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**RESPONSE TO REMOVAL ORDER**

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**NOW INTO COURT**, through undersigned counsel, comes the Defendant, **THE LOUISIANA COMMUNITY AND TECHNICAL COLLEGE SYSTEM (“LCTCS”)**, who responds to the Removal Order of this Court (Doc. 5) as follows:

1. a. Defendant previously filed a list of all attorneys involved in the case and the parties they represent (Doc. 1-2);
  - b. See State Court record attached as Exhibit 1;
  - c. See Exhibit List attached as Exhibit 2; and,
  - d. I, Maylan M. Cruickshank, hereby certify that the attached Exhibit 1, is what we received in response to our request for the court’s entire record, to the 14<sup>th</sup> Judicial District Court.
2. Not applicable.
3. Pursuant to Dana Brantley with the 14<sup>th</sup> Judicial District Court, she confirmed no funds are being held as to what is commonly known as “registry funds.”

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Respectfully Submitted,

**LIZ MURRILL  
ATTORNEY GENERAL**

/s/Maylan M. Cruickshank

MAYLAN M. CRUICKSHANK  
ASSISTANT ATTORNEY GENERAL  
Bar Roll No. 41058

**LOUISIANA DEPARTMENT OF JUSTICE  
LITIGATION DIVISION**

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*Counsel for the Louisiana Community and  
Technical College System*

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<b>LIBBIE E. WILLIAMS</b>	*	<b>CIVIL ACTION</b>
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<b>LOUISIANA COMMUNITY AND TECHNICAL COLLEGE SYSTEM</b>	*	<b>DISTRICT JUDGE: JAMES D. CAIN, JR.</b>
	*	
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*****		

**CERTIFICATE OF SERVICE**

I hereby certify that, on the 3<sup>rd</sup> day of January 2025, the foregoing was electronically filed using the Court's CM/ECF system and that a copy of the foregoing was served on **all counsel of record** for the Plaintiff by email and U.S. Mail.

**Libbie E. Williams**  
*Plaintiff, through her attorney of record*  
Somer G. Brown  
THE COX LAW FIRM  
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Lake Charles, Louisiana 70601  
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/s/Maylan M. Cruickshank  
**MAYLAN M. CRUICKSHANK**